

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARNOLD LEVINE and ALLEN S. POPPER,

Plaintiffs,

v.

ASSOCIATION OF LEGAL AID ATTORNEYS, UAW
LOCAL 2325; LEGAL AID SOCIETY; AND THE CITY
OF NEW YORK,

Defendants.

Case No. 1:24-cv-02733-PKC

**DECLARATION OF ABHINAYA SWAMINATHAN IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

I, Abhinaya Swaminathan, am a member of the Bar of this Court and an attorney at the law firm of Freshfields Bruckhaus Deringer US LLP, counsel for Defendant Legal Aid Society (“Legal Aid”) in the above-captioned matter. I respectfully submit this declaration in support of Defendants’ Motion to Dismiss the Complaint. The facts set forth in this declaration are based on my personal knowledge, information, and belief, unless otherwise stated.

1. Attached as Exhibit 1 is an excerpt of a true and correct copy of a contract between Legal Aid and New York City, dated October 12, 2018.
2. Attached as Exhibit 2 is a true and correct copy of the 2022 – 2025 Collective Bargaining Agreement between The Association of Legal Aid Attorneys, UAW Local 2325 and Legal Aid, dated July 1, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2024
New York, New York

Respectfully submitted,

/s/Abhinaya Swaminathan
Abhinaya Swaminathan